



Chair Imeson, State forester Dougherty, and members of the Board, thank you for the opportunity to speak with you today. For the record, my name is Seth Barnes, and I'm the Director of Forest Policy at the Oregon Forest & Industries Council.

Over the last several years as ODF has embarked on a mission to revise the current Forest Management Plan (FMP) you have heard repeated testimony from OFIC and our member companies. We've commented on everything from specifics within different proposals, to process and expert representation. One theme that you've heard repeatedly has been the notion of comparing alternatives to a baseline, one that uses the FPA as a point of reference so you as board members can understand associated costs from different potential choices. We have strongly urged this board to request such a comparison of the department. As we've once again learned, the department intends to ignore our counsel, and will use the current FMP as the point of comparison moving forward. Understanding that this was the decision of the department, I've decided that I will do my best to provide such an analysis for you. To that end, I intend to bring a level of analysis back to you at each substantive opportunity- as the department prepares alternatives for your consideration, I will do my best to project the relative costs of those alternatives back to FPA standards.

To that end I would call your attention to the table I've prepared for you. This table illustrates how an analysis of this kind can work. For this illustration I've used the '5 trees per acre' example that ODF produced for you earlier today.

#### Explain Table 1

I will do the best I can to provide good analysis for you, and I hope you will find it informative and useful as you wrestle with the choices in front of you.

Thank you for the opportunity to offer comment.

Seth Barnes

Table 1

GPV	Guiding Principal	Goal	Strategy	Measurable Outcome	Quantifiable Target	Standard	OFIC Supplemental Analysis against FPA			
							FPA Standard	Difference in standard	Annual Difference	
									Mbf	Total \$
(12)(b) Protects, maintains and enhances native wildlife habitats	Protect, maintain, and enhance native wildlife habitat types	Contribute to a range of wildlife habitats types	Incorporate legacy structure at a landscape level	Number or large trees on the landscape over time, across all stand types	Average of >= 3 TPA >= 32" Dbh and >= 1 TPA >=40 DBH within individual management basins	Retain live green trees				
						Average of 5 TPA over regen units in an AOP, some units less, some more	2 TPA > 11"	3 TPA, size difference	(7,526)	\$ (2,897,615.49)
						Additional retention >5 TPA where needed to meet snag and down wood recruitment goals	None	Not specific enough to make a comparison	Negative	Negative
						Variety of species, both with and without defect	None	Inconsequential	None	None
						Variety of treatments within stands	None	Unclear what the standard will do	Unknown	Unknown
Assume final harvest of 6477 acres per year (2018 CFTLC report)										
Average 11" tree has 49 Net board feet per tree										
Assume ODF average leave tree is 18" has 252 Net board feet per tree										
Assume \$385/Mbf stumpage										